

FILED

SEP 30 2019

yf

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURTUnited States District Court
Northern District of Illinois

Plaintiff)
 Henry Nwaste)
 v. Austin Akalony)
 Chukw Dnnionu)
 Defendant)
 Theodore Akalony)
 Chidiebere chiege)
 COMPLAINT

1:19-cv-06475
 Judge Elaine E. Bucklo
 Magistrate Judge Sheila M. Finnegan

Title 18, U.S.C., Section 241 - Conspiracy Against Rights.

During the recently concluded Imo State University (imsu) North America Chapter Alumni Elections, held on Saturday September 28th, 2019. It was observed that majority of Eligible Online voters were disenfranchised.

The Election lasted for only Nine (9) minutes, against the One (1) hour duration that was explicitly stipulated on the Electoral Guidelines of the Association. This was just a ploy to influence the outcome of the election in favor of one particular candidate.

The voters Register was also populated with ineligible voters, these are ineligible voters are individuals that do not reside in North America and not registered to the association, and are therefore not supposed to participate in the election. I hereby request for this Honorable Court to place an injunction on the defendant Chidiebere chiege, refraining him from purading himself as the winner of the election and as chairman of the association. I also ask that the court should Annul the election and mandate the association to conduct a rerun for a free and fair election.

09/30/2019

Addendum

1. Title 18, U.S.C., Section 241 - Conspiracy Against Rights.
Majority of Eligible Online Voters were disenfranchised during the last Imo State University (IMSU) North America Alumni Chapter Elections, which occurred on Saturday September 28th, 2019. The Election lasted for only Nine (9) minutes and this was just an effort to influence the election in favor of one particular candidate, the duration of the Election was against the One (1) hour duration that was explicitly stipulated on the Electoral guidelines. The Voters Register was also filled with ineligible voters, these ineligible voters are individuals that do not reside in North America and are therefore not supposed to participate in the Election. I hereby request for this honorable court to place an Injunction on the Defendant Chidi Chiege, refraining him from parading himself as the Winner of the Election and as Chairman of IMSU North America Alumni, I also ask for the Election to be Annulled given that it was not Free and Fair.

Monday, September 30, 2019 at 10:03:18 AM Central Daylight Time

Subject: Screenshot 2019-09-30 at 9.54.11 AM

Date: Monday, September 30, 2019 at 9:54:30 AM Central Daylight Time

From: Henry Nwaete

To: Henry Nwaete

••• T-Mobile Wi-Fi ⚡ 9:54 AM 35%

< 12  IMSU ALUMNI NORTH AM... <
+1 (832) 530-8533 is typing...

secretary.

5:53 PM

+1 (832) 530-8533 ~Ihuomachukwu

Give more time for people to
assimilate.

5:54 PM

+1 (646) 643-5951

~Obi Akano

+1 (832) 530-8533 ~Ihuomachukwu

Please post the names of those contesting
again!

Coming up

5:54 PM

+1 (713) 530-4326 ~Theodore Akalo...

VOTING HAS STARTED

5:55 PM

Monday, September 30, 2019 at 10:01:18 AM Central Daylight Time

Subject: Screenshot 2019-09-30 at 9.55.14 AM

Date: Monday, September 30, 2019 at 9:55:32 AM Central Daylight Time

From: Henry Nwaete

To: Henry Nwaete

••• T-Mobile Wi-Fi ⚡

9:55 AM

34%

< 12



IMSU ALUMNI NORTH AM...

+1 (832) 530-8533 is typing...

3 more minutes to end of online
voting

6:02 PM

+1 (713) 530-4326 ~Theodore Akalo...

Voting will stop ⚡ in 3 minutes!!!

6:02 PM

Voting will stop ⚡ in 3 minutes!!!

6:03 PM

Voting will stop ⚡ in 2 minutes!!!

6:03 PM

+1 (301) 291-8880

~!je

I didn't get any code oo

6:04 PM

+1 (713) 530-4326

~Theodore Akalo...

Monday, September 30, 2019 at 10:01:02 AM Central Daylight Time

Subject: Screenshot 2019-09-30 at 9.55.44 AM

Date: Monday, September 30, 2019 at 9:56:01 AM Central Daylight Time

From: Henry Nwaete

To: Henry Nwaete

••• T-Mobile Wi-Fi ⚡

9:55 AM

34%

< 12



IMSU ALUMNI NORTH AM...

+1 (832) 530-8533 is typing...

0:04 PM

+1 (713) 530-4326 ~Theodore Akalo...

Voting will stop in 1 minutes!!!

6:04 PM

+1 (713) 530-4326 ~Theodore Akalo...

+1 (301) 291-8880

~!je

I didn't get any code oo

Text with your name

6:04 PM

+1 (760) 912-0762

~Jude

Voted

How Can we know how many
people that caste vote and if every
vote was counted?

6:05 PM

+1 (713) 530-4326 ~Theodore Akalo...

Online voting stops NOW!

6:05 PM

+1 (925) 597-0622 ~Chux

Good timing!

6:05 PM

+1 (346) 219-4574

~NachyDyph

+1 (713) 530-4326 ~Theodore Akal...

Online voting stops NOW!



Sent from my iPhone

ELECTORAL GUIDELINES FOR IMSU ALUMNI NORTH AMERICA. CHAPTER 2019 ELECTION

These guidelines were developed by the 2019 IMSU ALUMNI Electoral Committee to govern the general conduct of the IMSU ALUMNI NORTH CHAPTER Elections.

Basically, this document will be enforced as outlined by the Alumni Elections Committee.

1. Candidates for any elective position shall be responsible for these regulations provided herein. Ignorance of these regulations shall not be a valid defense in response to any offense in this election, either by the candidates themselves, by individuals or agents campaigning on behalf of a candidate.
2. These regulations are subject to interpretation only by the Alumni Elections Committee and are subject to review and modification only by the Alumni Elections Committee with approval by the General House. No other member of the Alumni Association is authorized to officially interpret the Elections Code.

The Composition and Duties of the Electoral Committee

The Alumni Elections Committee shall compose of three persons (3) namely: the Chairman, Secretary and Member, and shall conduct the IMSU ALUMNI NORTH AMERICA CHAPTER elections, and referendum and ratification votes which are provided for by the Chapter Association Constitution if any, in accordance with the provisions of this Elections Code.

2019 IMSU Alumni NORTH AMERICA Chapter Elections Guidelines

1. The Alumni IMSU ALUMNI NORTH AMERICA Chapter Elections shall be held on the 28TH of September 2019.
2. Any candidate that intends to contest for any position must be a graduate of Imo state University, Owerri, Nigeria.
3. All candidates and voters must have registered with the IMSU ALUMNI NORTH AMERICA Chapter.
4. All candidates for the respective elective positions must be financially up to date.

5. For a registered member to be eligible to vote, he or she must be financially up to date by midnight September 27th, 2019.
6. Abusive remarks by a candidate or his or her supporters will constitute as grounds for the disqualification of the candidate/supporter involved.
7. The Elections shall be done by secret ballot system as agreed by the general house.
8. Each candidate will be given 3 minutes or more to deliver their respective manifestos as agreed by the general house.
9. Questions directed to the respective Candidates should border on the Alumni Association and is not meant to embarrass or malign the character of any of the prospective candidates.
10. Voting eligibility registration ends at noon Friday September 27th, 2019.
11. All public campaigning would cease by Friday September 27th, 2019 at 12 am.
12. WhatsApp votes would be by open ballot except for the contestants.
13. Voting will start at 4 pm central time and end at 5 pm central time.
14. Eligible voters that are not present during the elections/convection can vote online only with their own registered numbers the WhatsApp group created for the purpose of voting
15. Only the electoral chairman can announce the results.
16. Contestants must be registered and physically present at the venue of election/ convention to contest for any position.

Electoral observers:

1. Chris Anyanwu (President emeritus)
2. Ugochukwu Enweruzo

**3. Crespo Chinonso Epuzoaju (Chairman, Imo state University Alumni
Abia state chapter)**

SIGNED:

Member: Afoma Egboluche

Chairman Electoral Committee: Theodore Akalonu

Updated Voters Registry with Phone Numbers

NAMES	PHONE NUMBERS
Adaeze Obioha	248-325-4618
Adaugo Ekezie	832-951-1204
Afoma Egboluche	832-759-0706
Anthony Chinasa Odumukwu	347-983-3872
Arnold Amonu	305-905-9945
Austin Akalonu	281-965-5839
Benson Okereke	347-593-4956
Bruno Iroanya	919-670-9941
Cherry Mbama	706-572-8581
Chidi Chiege	832-715-8762
Chidi Nwachukwu	240-481-0437
Chidi Sobiere	346-762-7776
<u>Chidimma Uwakwe</u>	<u>240-593-9311</u>
Chiemeka Ezeogu	646-675-8980
Chike Uwazie	786-613-1040
Chikodinaka Kanu	347-257-0193
Chinonso Agbor	973-687-9959
Chinwe Nwachukwu Nnodim	562-881-2574
Chinwe Ononuju	404-287-9448
Chioma Acholonu	856-357-7854
Chioma Nnorom	832-955-6954
Chris Acho	832-744-5784
Chris Ezeala	234 803-711-4332 /929-353-0929
Chuks Ekweogu	9293530929
Chuks Ononiwu	281-846-0326
Chukwuneye Akunaeziri	832-552-9768
<u>Dozie Obodo</u>	<u>832-542-4931</u>
Ego Nnabugwu	214-228-0651
Emeka Akwari	281-492-4786
<u>Emeka Ebiringa</u>	<u>832-679-2141</u>
Emeka Ijezie	346-288-0847
Emma Duru	346-412-8897
Emmanuel Chikere	872-235-5785
Ephraim Obiamaukuwu	646-353-3201
<u>Ezinne Olisa</u>	<u>240-486-6009</u>
Ginika Oforah	832-692-2879
Henry Nwete	312-889-8990
Ify Okoroafor	832-282-4449
Ihuoma Akogu	832-530-8533
Ijeoma Iwuamadi	832-782-9885
Ijeoma Ndokwu	203-550-7515
Ijeoma Okorie Ekeada	240-548-8027
Ijeoma Whyte	469-350-3699

<u>Ikechukwu Anozie</u>	<u>281-760-5462</u>
Ikenna Ekeada	240-544-8246
Irene Orioha	713-628-2068
Izunna Ofoma	832-614-0516
Jane Frances Ujagbo Ofoegbu	323-617-7360
Jane Okereke	832-949-4007
Jiwueze Chukwudi	929-990-7509
Joachin Anyanwu	215-469-7025
Jonas Onuoha	559-558-7176
Jude Njoku	760-912-0762
katherine Allison	469-720-1000
Kelechi Emenyonu	862-253-9856
Legachi Nkwocha	4242978058
Maxwell Ositadinma	215-909-1695
Michael Duru	713-517-9466 /234 803-323-4995
Nachi Harrison	346-219-4575
Nneka Ogoke	646-236-1013
Obi Akano	646-643-5951
Odinaka Nwosu	313-221-0503
Ogechi ibebuaku	682-556-7856
Ogechi Obijiaku	617-652-1413
Okafor Chinedu	281-818-6598
Okey Onyeokoro	343-987-2573
<u>Prisca Chinyere</u>	<u>346-412-8529</u>
Rev. Dr. (Mrs) Ogechi Joy Anwukah PHD	415-666-5990
<u>Rosemary Ezeibekwe</u>	<u>832-430-9828</u>
Ruphina Nnebedum	240-374-2906
Sandra Diala	281-854-5107
Theo Akalonu	713-530-4326
Tita Obi-Obioha	973-333-1797
Tony Mkolulu	413-426-3831
Uche Nwankwo	301-820-5990
ugochukwu obioha	248-778-7217
Uju Anyanwu	443-857-2601
Uzomah Nwaigwe	971-407-6107
Victoria Omorodion	301-806-2702

VOTERS CODE	QUALIFIED
	YES / NO
IHV001	YES
IHV002	YES
IHV003	YES
IHV004	YES
IHV005	YES
IHV006	YES
IHV007	YES
IHV008	YES
IHV009	YES
IHV010	YES
IHV011	YES
IHV012	YES
IHV013	YES
IHV014	YES
IHV015	YES
IHV016	YES
IHV017	YES
IHV018	YES
IHV019	YES
IHV020	YES
IHV021	YES
IHV022	YES
IHV023	YES
IHV024	YES
IHV025	YES
IHV026	YES
IHV027	YES
IHV028	YES
IHV029	YES
IHV030	YES
IHV031	YES
IHV032	YES
IHV033	YES
IHV034	YES
IHV035	YES
IHV037	YES
IHV038	YES
IHV039	YES
IHV040	YES
IHV041	YES
IHV042	YES
IHV043	YES
IHV045	YES

IHV046	YES
IHV047	YES
IHV048	YES
IHV049	YES
IHV050	YES
IHV051	YES
IHV052	YES
IHV053	YES
IHV054	YES
IHV055	YES
IHV056	YES
IHV057	YES
IHV058	YES
IHV060	YES
IHV061	YES
IHV062	YES
IHV063	YES
IHV065	YES
IHV066	YES
IHV067	YES
IHV068	YES
IHV069	YES
IHV070	YES
IHV071	YES
IHV072	YES
IHV073	YES
IHV074	YES
IHV075	YES
IHV077	YES
IHV078	YES
IHV079	YES
IHV080	YES
IHV081	YES
IHV082	YES
IHV083	YES
IHV084	YES

REMARKS

Present

Present

Present

Present

Present

Present

Present

Present
Present

Present

Present
Present
Present

Present